

**From:** [Mimi Newton](#)  
**To:** [P65Public Comments](#)  
**Subject:** Glyphosate NSRL  
**Date:** Wednesday, June 21, 2017 4:33:10 PM

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I urge you to adopt an NSRL for glyphosate as close to zero as possible.

Glyphosate herbicide has been found in tap water, our children's urine, mother's breastmilk, and childhood vaccines.

Glyphosate has been shown by Monika Kruger of Germany to bioaccumulate in bone marrow, muscle tissues etc.

Glyphosate has been shown to be a neurotoxin, chelator, antibiotic, and carcinogen which also causes liver disease.

One way glyphosate functions is by breaking down the blood-brain barrier and allowing other toxins ( such as those found in vaccines and herbicides) into the brain.

Studies show 1100 micrograms daily to be far too high an exposure level. In comparison chemical 2,3,7,8-Tetrachlorodibenzo-p -dioxin (TCDD), also on the Prop 65 list has a NSRL Of .000005 micrograms per day. Because glyphosate has been shown to bioaccumulate, and has been shown in the parts per trillion to increase the growth of breast cancer cells, the reality is that there is no safe level.

Furthermore, OEHHA has not thoroughly followed the California Code of Regulations Section 25703(a)(2), which requires OEHHA to consider epidemiological data in your assessment of an NSRL. And, OEHHA only considered one animal bio-assay study whereas other studies exist which demonstrate the development of tumors at lower exposure levels, namely Wood et al (2009) and Lankas (1981).

It is also very important that industry meetings with regulators, such as Monsanto's meeting with OEHHA regarding the NSRL, should be open to public scrutiny, especially since Monsanto presented data during the meeting with OEHHA in support of an NSRL.

I am also concerned with the assessment process and that it: (1) only takes into consideration the safe level for a 70kg adult, not children; (2) it is based on exposure through dietary means, not contact with Roundup sprayed on park grass or drift from a nearby farm; and (3) it only considered glyphosate, which is never used alone, and failed to consider its use in connection with other surfactants and ingredients which have also been shown to be toxic.

Thank you for your consideration of these comments,

Meredith Newton  
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